

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EMAD RUSHDIE-AHMED,

Plaintiff,

v.

TRUSTEES OF THE UNIVERSITY  
OF PENNSYLVANIA, et al.,

Defendants.

Civil Action No. 2:22-cv-5030-JMY

**ATTORNEY, SETH CARSON DECLARATION  
IN CONNECTION WITH THE FOLLOWING**

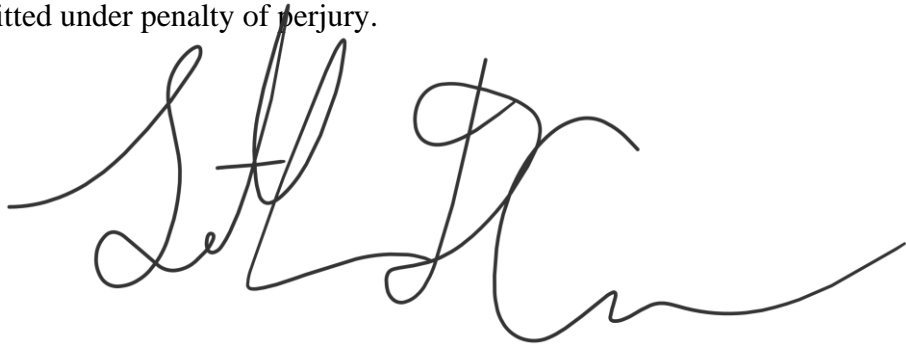
**PLAINTIFF, EMAD RUSHDIE-AHMED'S RESPONSE AND OPPOSITION TO  
DEFENDANT'S MOTION IN LIMINE 2, TO EXCLUDE RICHARD ZETTLER'S  
MAY 25, 2021, EMAIL AND ANY TESTIMONY REGARDING PURPORTED  
PERSONAL BIAS THAT IS NOT RELATED TO A PROTECTED CHARACTERISTIC**

I Seth Carson do hereby DECLARE under penalty of perjury that the following is true, accurate and correct based upon my personal and direct knowledge.

1. I represent Plaintiff, Emad Rushdie in the above captioned matter.
2. On Wednesday, May 28, 2025, I finished drafting a Response to Defendants' Motion in Limine 2 in which Defendants argued that former Chair of the NELC Department, Richard Zettler had a conversation through several emails where Richard Zettler and Paul Cobb discussed the process that Defendants were using to terminate Mr. Rushdie's employment and how that process was not fair to Emad Rushdie.
3. I finished drafting Plaintiff's Response to Defendants' Motion in Limine 2 and filed Plaintiff's Response which is currently on the docket. *See* (ECF, Document 58).

The above Factual Statements are submitted under penalty of perjury.

June 6, 2025

A handwritten signature in black ink, appearing to read 'Seth D. Carson', is written over the date line.

Plaintiff respectfully requests the Court consider Plaintiff's written submission filed on May 29, 2025, at approximately 12:10 A.M. *See Plaintiff's Opposition to Defendants' Motion in Limine 2. Plaintiff attached a screen shot of the docket as of the filing of this Declaration and ECF, Document 58, which are marked as Exhibit 1 and 2, respectively.* Plaintiff also notes that the Court cited Professor Zettler's electronic discussion with Professor Cobb in holding, "... ***Here, the apparent presence of personal bias in the process, the failure to fully comply with the Department's policies regarding termination, and Defendants' alleged discriminatory comments regarding Plaintiff's age are sufficient for a reasonable juror to potentially disbelieve the proffered explanation.***" (ECF, Document 30, p.3 ¶ 2 and p.7-8, ¶ 1).

**SETH D. CARSON, ESQUIRE**

BY: /s Seth D. Carson  
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DATED: June 6, 2025

**CERTIFICATE OF SERVICE**

I, Seth D. Carson, hereby certify that on this date the foregoing Declaration was filed with the Court and is available for viewing and downloading from the ECF System and thereby have been served upon the following counsel of record, electronically:

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DATED: June 6, 2025